

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
(WESTERN DIVISION)**

IN RE MERCY HEALTH ERISA LITIGATION

Civil Action No.: 1:16-cv-00441-SJD

**JOINT DECLARATION OF LAURA R. GERBER, MICHELLE C. YAU AND  
THOMAS R. THEADO IN SUPPORT OF PLAINTIFFS' MOTIONS FOR FINAL  
APPROVAL OF A CLASS ACTION SETTLEMENT AND FOR AWARD OF  
ATTORNEYS' FEES AND EXPENSES AND CASE CONTRIBUTION AWARDS**

**EXHIBIT C  
KELLER ROHRBACK LLP  
ANALYSIS OF TIME, LODESTAR & EXPENSES**

**Keller Rohrback L.L.P.**

***In re Mercy Health ERISA Litigation, 1:16-cv-00441-SJD-SKB (S.D. Ohio)***

**Reporting Period: Inception - October 10, 2018**

<b>Timekeeper*</b>	<b>Position</b>	<b>Years of Practice</b>	<b>Rate</b>	<b>Hours</b>	<b>Lodestar</b>
Christopher T. Graver	Partner	28	\$ 870.00	24.7	\$ 21,489.00
Havila C. Unrein	Partner	10	\$ 700.00	44.1	\$ 30,870.00
Laura R. Gerber	Partner	14	\$ 775.00	210.5	\$ 163,137.50
Lynn Lincoln Sarko	Partner	37	\$ 995.00	5.2	\$ 5,174.00
Ron Kilgard	Partner	39	\$ 940.00	68.8	\$ 64,672.00
Matthew M. Gerend	Attorney	8	\$ 575.00	9.5	\$ 5,462.50
A.J. de Vries	Paralegal	--	\$ 285.00	139.85	\$ 39,857.25
Alex Gotto	Paralegal	--	\$ 230.00	7	\$ 1,610.00
Jennifer Tuato'o	Paralegal	--	\$ 325.00	406.7	\$ 132,177.50
Joel M. Garrido	Paralegal	--	\$ 250.00	6.6	\$ 1,650.00
			<b>Totals</b>	<b>922.95</b>	<b>\$ 466,099.75</b>

\*Excludes any timekeeper with fewer than five hours

Keller Rohrback L.L.P.

*In re Mercy Health ERISA Litigation*, 1:16-cv-00441-SJD-SKB (S.D. Ohio)

Reporting Period: Inception - October 10, 2018

	1	2	3	4	5	6	7	8	9	10	11	
Timekeeper*	Initial Compl.	23(g)	Discovery	Amended Compl.	MTD	Misc. Motions/	Mediation/ Settlement	Prelim. Approval	Client Contact	Other Class Member	Final Approval	Total Hours by Timekeeper
<b>Attorney:</b>												
Christopher T. Graver		0.1			0.1	1.5	5.7	13.1			4.2	24.7
Havila C. Unrein	12.2	0.2		4.5		0.9			9.9	16.4		44.1
Laura R. Gerber	32.8	43.3	3.5	39.6		3.9	29	11.7	39.5	2.8	4.4	210.5
Lynn Lincoln Sarko	0.3	1.1		0.3		0.7	2.2	0.6				5.2
Matthew M. Gerend				4	5.2		0.2				0.1	9.5
Ron Kilgard	10.6	35.9	3.3	2.2	0.9	5.9	4.6	1.2	1.5	2.7		68.8
<b>Sub-Total</b>	<b>55.9</b>	<b>80.6</b>	<b>6.8</b>	<b>50.6</b>	<b>6.2</b>	<b>12.9</b>	<b>41.7</b>	<b>26.6</b>	<b>50.9</b>	<b>21.9</b>	<b>8.7</b>	<b>362.8</b>

<b>Other Professionals:</b>												
A.J. de Vries	5.5	18.35	47.2	17.2	0.5		1.5	2.3	12	28.4	6.9	139.85
Alex Gotto			7									7
Jennifer Tuato'o	84.5	8.4	32.7	50.7		0.8	21.4	3.4	32.7	172.1		406.7
Joel M. Garrido								0.9			5.7	6.6
<b>Sub-Total</b>	<b>90</b>	<b>26.75</b>	<b>86.9</b>	<b>67.9</b>	<b>0.5</b>	<b>0.8</b>	<b>22.9</b>	<b>6.6</b>	<b>44.7</b>	<b>200.5</b>	<b>12.6</b>	<b>560.15</b>

<b>Grand Totals</b>	<b>145.9</b>	<b>107.35</b>	<b>93.7</b>	<b>118.5</b>	<b>6.7</b>	<b>13.7</b>	<b>64.6</b>	<b>33.2</b>	<b>95.6</b>	<b>222.4</b>	<b>21.3</b>	<b>922.95</b>
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\*Excludes any timekeeper with fewer than five hours.

**FIRM NAME: Keller Rohrback L.L.P.**

***In re Mercy Health ERISA Litigation, 1:16-cv-00441-SJD-SKB (S.D. Ohio)***

**REPORTING PERIOD: Inception - October 10, 2018**

Description	Amount
Copies	\$ 2,081.23
Postage/Express Delivery	\$ 1,925.81
Court Costs	\$ 1,200.00
Computer-Based and Other Research	\$ 2,339.79
Travel (Air Fare, Ground Travel, Meals and Lodging)	\$ 2,484.07
<b>Sub-Total</b>	<b>\$ 10,030.90</b>